



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

October 15, 2008

Ms. Cathy Barbouletos, Supervisor,
Flathead National Forest
650 Wolfpack Way
Kalispell, Montana 59901

Re: CEQ 20080377; Sheppard Creek Post-Fire Project Final
Environmental Impact Statement

Dear Ms. Barbouletos:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) for the Sheppard Creek Post-Fire Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The EPA appreciate receipts of responses to EPA's DEIS comments and to the comments of other agencies and the public. The FEIS identifies Alternative B as the preferred alternative. While we acknowledge that the increase in sediment loading with Alternative B over Alternative C is small in comparison to sediment loading that may occur due to natural erosion processes on the burned, post-fire landscape, the EPA continues to support selection of Alternative C as the preferred alternative among action alternatives. Alternative C includes less sediment production and road construction activities in the watershed of Sheppard Creek, a water quality impaired stream (i.e., 36.8 tons of estimated potential sediment production in Alt. C vs. 71.8 tons in Alt. B; and 1.8 miles of temporary road construction & 7.3 miles of road reconstruction proposed in Alt. C vs. 7.5 miles temporary road construction and 15.4 miles road reconstruction in Alt. B).

We are pleased that efforts will be made to avoid high risk and sensitive areas during logging and road construction, and that less ground disturbing logging methods will be used. We support the proposal to improve BMPs on haul roads, including upgrading of 4 culverts, and are pleased that eight undersized culverts on Sheppard Creek were replaced and many post-fire erosion control activities were conducted through the BAER program. In addition, we are pleased that an additional 19 miles of road decommissioning, including 21 culvert removals, are proposed to begin this Fall in association with the Sheppard-Griffin Decision Notice (page 3-148). The FEIS estimates that the collection of these activities would likely offset sediment production from proposed management activities and reduce sediment delivery to Sheppard Creek over the long-term (page 3-147). We do not oppose, therefore, the implementation of Alternative B, although we still consider Alternative C to be more consistent with policies promoting improvement and restoration of water

quality impaired waterbodies. It is also relevant that sediment production associated with proposed salvage logging and road construction/reconstruction activities will likely be exceeded to a great extent by natural erosion that may occur on the burned landscape in the project area (Table 3-48a). We do want to encourage you to evaluate and consider any additional road decommissioning or other watershed improvement opportunities that may present themselves in order to provide the greatest possible assurances that Sheppard Creek is put on a track of water quality improvement and restoration of full support of beneficial uses over the long-term.

We are pleased that the riparian harvests proposed in Alternative D do not appear to be proposed as part of the preferred alternative in the FEIS. We do not support riparian harvests that would reduce channel stability and recruitment of woody material to Sheppard Creek, and thus, limit the long term recovery of stream and riparian conditions in Sheppard Creek.

We also appreciate being provided with the project exhibit identifying the Sheppard Creek project interdisciplinary team's response to the 1995 and 2004 Beschta Reports. This information facilitated our understanding of the many efforts that have been made to address soil, water and ecological concerns associated with the proposed post-fire salvage logging.

We thank you for the opportunity to review and comment during the NEPA process, including the opportunity for my staff to review and discuss this proposed project in the field with your staff. If you have any questions please contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at 406-329-3313. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John F. Wardell", with a stylized flourish at the end.

John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena